

# EXHIBIT 48

# BLDS, LLC

**Christopher Erath, Ph.D.**  
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## Summary

Dr. Erath received A.B. degrees in Economics and Mathematics from Bowdoin College and a Master's and Ph.D. in Economics from the University of Wisconsin.

Dr. Erath's primary area of interest is labor economics. He has served as an expert witness in numerous matters involving damages in employment discrimination and wage and hour claims and has also prepared extensive studies of statistical liability in employment proceedings and opined on class certification issues. In addition, he has directed research into various antitrust issues such as damages from patent infringement and breach of contract as well as for use in regulatory prudence hearings. Dr. Erath instructed graduate courses in econometrics at the University of Wisconsin.

In wage and hour matters, Dr. Erath has served as an expert in dozens of cases involving allegations of off-the-clock work, miscalculated pay rates, denial of compensatory time usage, and misclassification. Using data sets as large as millions of records, actual pay data and consideration of all compensation as well as paid time off, he has produced estimates of potential losses which accurately reflect the facts of each case and opined on the consistency of such data with alleged violations.

## Education

### **University of Wisconsin**

Ph.D., Economics, 1997

Major Fields: Labor Economics, Econometrics

M.A., Economics, 1992

### **Bowdoin College**

A.B., Economics and Mathematics, 1987

## Professional Experience

### **BLDS, LLC**

2011-Present Director

### **NERA Economic Consulting**

2004-2011 Senior Vice President

1999-2003 Vice President

1997-1999 Senior Consultant

1995-1996 Senior Analyst

1987-1995 Various research positions

### **University of Wisconsin**

1991-1995 Teaching Assistant

## Publications and Presentations

“Common Pitfalls in Evaluations of Economic Loss,” ALI Conference, Washington, D.C., 2013

“Simplicity is Not Always a Virtue,” ALI-ABA Conference, Washington, D.C., 2012

“Battle of the Experts,” “Disparate Impact,” and “Economic Damages,” ALI-ABA Conference, Santa Fe, NM, 2011

“Statistics and RIFs: What You Don’t Know Can Hurt You,” New York City Bar Association, 2009

“The Quick and Easy Way is Rarely the Right Way,” Practising Law Institute, 2005, in Litigating Employment Discrimination and Sexual Harassment Claims.

“Friend or Foe: Recent Changes from the OFCCP and the Supreme Court,” Employment Law Strategist, June 2005

## Testimony

*Foster et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*De La Cruz et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Pfeil v. Labcorp*, deposition testimony concerning economic loss in wrongful termination matter

*Gilmore et al v. City of New York, Nell et al v. City of New York, Viera et al v City of New York*, deposition testimony concerning damages in an FLSA matter.

*Richardson et al v. City of New York*, deposition testimony concerning employment statistics

*Bookman et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Campbell et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Lawtone-Bowles et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Adams et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Worley et al v. City of New York*, deposition testimony concerning damages in FLSA matter

*Klein v. Santander et al*, arbitration testimony concerning economic losses

*Port Authority PBA v. The Port Authority of New York and New Jersey*, arbitration testimony in wage dispute

*Ronnie Jones et al v. City of Boston et al*, trial testimony concerning economic losses

*OFCCP v. JBS LUX USA et al*, deposition testimony concerning economic losses

*Kuhn v. Advanced Surgery Center et al*, deposition testimony concerning economic losses

*State of New York and City of New York v. UPS*, deposition testimony concerning survey results

*Luisa Murdoch v. New York Life Insurance*, deposition testimony concerning economic loss

*Perry et al v. City of New York*, deposition and trial testimony concerning damages in FLSA matter

*City of New York v. Patrolman's Benevolent Association*, arbitration testimony in wage dispute

